UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

★ JAN 2 6 2009

BROOKLYN OFFICE

RENAISSANCE CARPET & TAPESTRIES, INC.,

Plaintiff,

-against -

CLASSIC FURNITURE and GERMANS BOLOTNIKOVS individually,

Defendants.



Jury Trial Demanded

DEARIE, CH. J LEVY, M.J.

Renaissance Carpet & Tapestries, Inc. ("Renaissance") for its complaint against the named defendants alleges as follows:

JURISDICTION

- This is a civil action for copyright infringement arising under the 1. copyright laws of the United States, 17 U.S.C. § 101 et seq. (the "Copyright Act"). Jurisdiction is based on 28 U.S.C. §§ 1331 and 1338(a) and under related state and common law.
- This Court has subject matter jurisdiction over this action pursuant 2. to 28 U.S.C. §§ 1331 and 1338, and supplemental jurisdiction over the related state and common law claims pursuant to 28 U.S.C. § 1367.
- This Court has personal jurisdiction over the defendants because 3. they maintain an office for business in Kings County, State of New York and within this judicial district.
 - Venue is appropriate in this Court under 28 U.S.C. § 1400(a). 4.

PARTIES

- 5. Plaintiff Renaissance Carpet & Tapestries, Inc. is a domestic corporation with its principal place of business at The Design Center, 200 Lexington Avenue, 10th Floor, New York, NY 10016. It is engaged in the business of designing, manufacturing, importing, and selling fine carpets, many of which embody original and proprietary designs.
- 6. Upon information and belief, Defendant Classic Furniture, is a domestic corporation with its principal place of business at 2324 McDonald Avenue, Brooklyn, NY 11223.
- 7. Upon information and belief, Defendant Classic Furniture, is an unincorporated association with its principal place of business at 2324 McDonald Avenue, Brooklyn, NY 11223.
- 8. Upon information and belief, Defendant Classic Furniture, is a partnership with its principal place of business at 2324 McDonald Avenue, Brooklyn, NY 11223.
- 9. Upon information and belief, Defendant Classic Furniture, is a sole proprietorship with its principal place of business at 2324 McDonald Avenue, Brooklyn, NY 11223.
- 10. Upon information and belief, Defendant Germans Bolotnikovs ("Bolotnikovs") is an individual residing at 1599 West 10th Street, #5F, Brooklyn, New York 11204.
- 11. Upon information and belief, Bolotnikovs is an officer of Classic Furniture and directed or controlled the wrongful acts of Classic Furniture herein.

- 12. Upon information and belief, Bolotnikovs is a shareholder of Classic Furniture and directed or controlled the wrongful acts of Classic Furniture herein.
- 13. Upon information and belief, Bolotnikovs is the sole proprietor of Classic Furniture and directed or controlled and is personally liable for the wrongful acts of Classic Furniture herein.
- 14. Upon information and belief and at all times hereinafter mentioned, defendants are engaged is in the business of importing, and/or selling carpets and household furnishings.

PLAINTIFF'S COPYRIGHTS

- 15. Renaissance is the owner and/or exclusive licensee of certain copyrighted designs of Savonnerie Carpets, specifically design numbers S-151, S-3, S-179 and S-196. (collectively, the "Renaissance Designs"). Copies of each design are annexed hereto as Exhibit A. Each of the Renaissance Designs is an original creation and constitutes copyrightable subject matter under the Copyright Act.
- 16. Renaissance has duly complied with all requirements of the Copyright Act with respect to the Renaissance Designs, has registered its copyrights in the Renaissance Designs in the United States Copyright Office and has obtained the following certificates of registration for the Renaissance Designs.

| Name of Design | Certificate Number | Date Registered |
|----------------|--------------------|-----------------|
| S-151 | VA-786-631 | 11/13/96 |

| S-3 | VA-763-598 | 12/12/95 |
|-------|--------------|----------|
| S-179 | VA-815-572 | 11/5/96 |
| S-196 | VA-1-313-161 | 3/8/06 |

17. Copies of the above-referenced certificates of registration are annexed hereto as Exhibit B.

CLAIMS FOR RELIEF

COUNT I – COPYRIGHT INFRINGEMENT

- 18. Plaintiff repeats and realleges the allegations above as if fully set forth herein.
- 19. Classic Furniture and Bolotnikovs, without authorization from Renaissance, have imported or caused to be imported and have advertised and sold products incorporating designs that are copied from and substantially similar to the Renaissance Designs.
- 20. Upon information and belief, plaintiff's Renaissance Designs were known to defendants. Defendants and plaintiff both operate in the same trade, which is a relatively narrow universe of commercial interests and competing parties.
- 21. Through its activities of importing, causing to be imported, marketing, advertising, offering for sale and sale of illegitimate knockoffs of plaintiff's Renaissance Designs, defendants Classic Furniture and Bolotnikovs have thereby infringed and, upon information and belief, are continuing to infringe upon Renaissance's copyrights in the Renaissance Designs.
- 22. Upon information and belief, the defendants' infringement of the Renaissance Designs was willful.

- 23. Upon information and belief, by the acts complained of, the defendants have made substantial profits and gains to which they are not in law or in equity entitled.
- 24. Upon information and belief, the defendants intend to and will continue to expand the infringing acts complained of herein, unless restrained by this Court
- 25. The infringement of plaintiff's Renaissance Designs by defendants has caused and/or will cause irreparable harm to plaintiff's business, reputation and goodwill unless restrained by this Court. Plaintiff has no adequate remedy at law for defendants' infringement.
- 26. Defendants' infringement has caused damage to plaintiff in an amount that cannot be determined without discovery. In addition, defendants have unjustly profited by their infringement of the copyrighted works to the detriment of plaintiff.
- 27. By reason of defendants' unlawful conduct as alleged above, plaintiff has been injured and is entitled to damages and defendants' profits attributable to defendants' unlawful conduct, which are presently indeterminate or, in the alternative, plaintiff's is entitled to elect statutory damages against defendants, pursuant to 17 U.S.C. § 1203(c), together with the costs of this action, and attorney's fees pursuant to 17 U.S.C. § 505.

COUNT II - UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN

- 28. Plaintiff repeats and realleges the allegations above as if fully set forth herein.
- 29. Upon information and belief, defendants have misappropriated catalogs, pricing lists and advertising materials which are proprietary to Renaissance for the purpose of offering products incorporating designs that are copied from and substantially similar to the Renaissance Designs.
- 30. According to plaintiff's information and belief, defendants have compounded their unlawful activities by placing a false copyright notice in its own name on their knockoffs of RENAISSANCE's original design. Such false copyright notice will deceive and/or confuse or will likely deceive and/or confuse the purchasing public into believing that the knockoff design is original to defendant.
- 31. By placing its false copyright notice on the knockoff rugs, defendant is effectively branding the knockoffs with its name or mark, thus creating a false designation or misrepresentation that will likely deceive and/or confuse the purchasing public that the works originate with defendants.
- 32. Defendants' conduct constitutes unfair competition and false designation of origin in violation of § 43(a) of the Trademark Act, 15 U.S.C. § 1125(a), separate and apart from plaintiff's claim of copyright infringement.
- 33. Defendants' conduct has caused and/or will continue to cause irreparable harm to plaintiff's business, reputation and goodwill unless restrained by this Court. Plaintiff has no adequate remedy at law for defendants' infringement.

- 34. Defendants' conduct has caused damage to plaintiff in an amount that cannot be determined without discovery. In addition, defendants have unjustly profited by their unlawful conduct to the detriment of plaintiff.
- 35. By reason of defendants' unlawful conduct as alleged above, plaintiff has been injured and is entitled to damages and defendants' profits attributable to defendants' unlawful conduct, which are presently indeterminate.

COUNT III - FALSE COPYRIGHT MANAGEMENT INFORMATION

- 36. Plaintiff repeats and realleges the allegations above as if fully set forth herein.
- 37. According to plaintiff's information and belief, defendants have placed a false copyright notice in its own name on its knockoffs of RENAISSANCE's original design. Such false copyright notice will deceive and/or confuse or will likely deceive and/or confuse the purchasing public into believing that the knockoff design is original to defendant.
- 38. By placing its false copyright notice on the knockoff rugs, defendant is effectively branding the knockoffs with its name or mark, thus creating a false designation or misrepresentation that will likely deceive and/or confuse the purchasing public that the works originate with defendants.
- 39. As set forth in the foregoing allegations an upon information and belief, defendants knowingly and with the intent to induce, enable, facilitate and/or conceal their infringement of plaintiff's Renaissance Designs provided false copyright management information and promoted, marketed, offered for

sale, sold and/or distributed the infringing knockoffs with false copyright management information in violation of 17 U.S.C. § 1202.

- 40. Defendants' conduct has caused actual damage to plaintiff in an amount which is presently indeterminate. Upon information and belief, defendants have profited by their conduct to the detriment of plaintiff.
- 41. Upon information and belief, the defendants' infringement of the Renaissance Designs and designation of false copyright management information was willful.
- 42. Plaintiff has no adequate remedy at law for defendants' unlawful conduct and unless defendants are permanently enjoined, plaintiff will continue to suffer irreparable harm.
- 43. By reason of defendants' unlawful conduct as alleged above, plaintiff has been injured and is entitled to damages and defendants' profits attributable to defendants' unlawful conduct, which are presently indeterminate or, in the alternative, plaintiff's is entitled to elect statutory damages against defendants, pursuant to 17 U.S.C. § 1203(c), together with the costs of this action, and attorney's fees pursuant to 17 U.S.C. § 505.

WHEREFORE, Renaissance demands as follows:

- (a) Declare that defendants have infringed plaintiff's copyrights in the Renaissance Designs;
- (b) Pursuant to 17 U.S.C. § 502, permanently enjoin defendants, together with their officers, agents, servants, employees and attorneys and all persons in active concert or participation with them from infringing the

Renaissance Designs or other copyrighted works owned or exclusively licensed by plaintiff in any manner, and from copying, making, marketing, selling, distributing and otherwise generating income from any works that have been derived in whole or in part from plaintiff's Renaissance Designs;

- (c) Pursuant to 17 U .S.C. § 503:
- (i) Order defendants forthwith to deliver up to plaintiff for destruction all remaining inventory of the infringing works;
- (ii) Order defendants to block out all references to the infringing designs from defendants' catalogs, brochures, websites and any other marketing or promotional material; to stop distributing catalogs, brochures or other marketing and promotional material that depict or otherwise reference the infringing designs; to delete any reference to the infringing designs from price lists, websites and all other marketing and sales material; and to advise customers that the infringing designs are no longer available;
 - (iii) Identify to Plaintiff all persons and entities that have purchased, licensed or otherwise received or to whom Defendants distributed any infringing designs;
 - (iv) Notify in writing all persons and/or entities that have purchased, licensed or otherwise received or to whom Defendants distributed any infringing designs, that said designs are unlawful and infringe plaintiff's copyrights, that any subsequent sale and/or distribution of the said infringing designs constitutes copyright infringement;

- (d) Pursuant to 17 U.S.C. § 504, order an accounting of all gains, profits and advantages derived by defendants from their copyright infringement and false copyright management information, and that defendants be required to pay to plaintiff the actual damages that plaintiff has sustained and defendant's profits attributable to their copyright infringement, including enhanced damages for defendants' willful infringement, in an amount to be determined at trial;
- (e) In the alternative and pursuant to 17 U.S.C. § 504(c), order that plaintiff shall be awarded statutory damages against and from defendants in an amount to be determined at trial;
- (f) Order defendants to disclose to plaintiff the source and/or collaboration of any developers, manufacturers, the supplier(s), distributors, vendors, agents, and dealers involved with the development, production, marketing, promotion, offer for sale and sale of the infringing designs;
- (g) Pursuant to 17 U.S.C. § 505, order defendants to pay plaintiff's costs and reasonable attorneys fees;
 - (h) Pursuant to 15 U.S.C. § 1116, permanently enjoin defendants:
 - (i) From passing off, inducing, or enabling others to sell or pass off any product or design copied from plaintiff's Renaissance Designs as genuine products;
 - (ii) From committing any acts calculated to cause purchasers to believe that defendants' products are genuine Renaissance Design;

- (iii) from committing any acts calculated to cause purchasers to believe that defendants' infringing designs, copied from plaintiff's original Renaissance Designs, are original works of defendants;
- (i) Pursuant to 15 U.S.C. § 1117, order an accounting of all gains, profits and advantages derived by defendants from their unfair competition and false designation of origin, and that defendants be required to pay to plaintiff the actual damages that plaintiff has sustained and defendant's profits attributable to their unfair competition and false designation of origin, and that such amounts be trebled as provided by law, together with Plaintiff's costs and reasonable attorney's fees;
- (j) Order defendants to pay over to plaintiff all profits and sums by which defendants have been unjustly enriched by reason of their unlawful acts as alleged herein.
- (j) That defendants, within thirty (30) days after service of the Order of permanent injunction and thereafter upon the entry of Final Judgment be required to file with the Court and serve upon plaintiff a written report under oath setting forth in detail the manner in which defendants have complied with the directives of the permanent injunction.

(k) Grant plaintiff such other and further relief that the Court may deem just and proper.

Dated:

January 23, 2009 New York, New York

By:

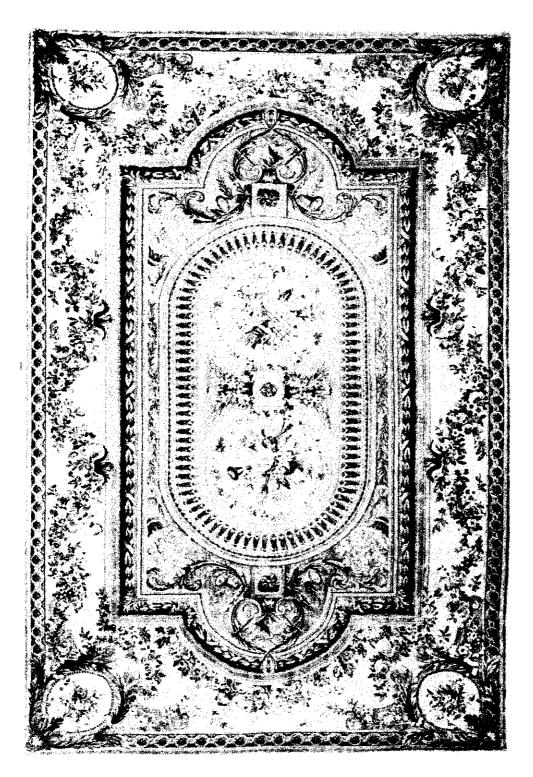
Steven Mancinelli (SM-0208) Mancinelli & Associates, P.C. 111 John Street, Suite 800 New York, New York 10038

Phone: 212-366-1324 Fax: 240-358-7375

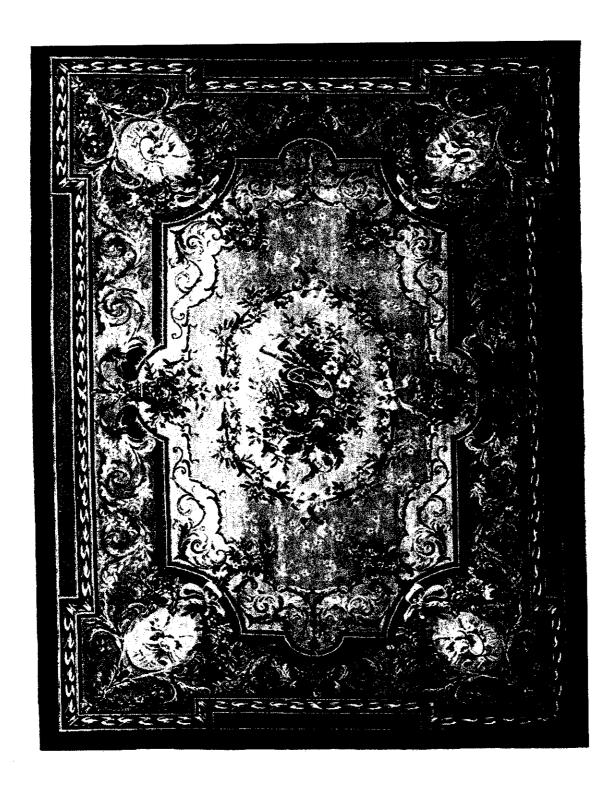
Steven Simenowitz (SS-8681) Attorney for Plaintiff Renaissance 22 Jericho Turnpike Suite 104 Mineola, NY 11501

Phone: 613-232-3117 Fax: 413-451-0841

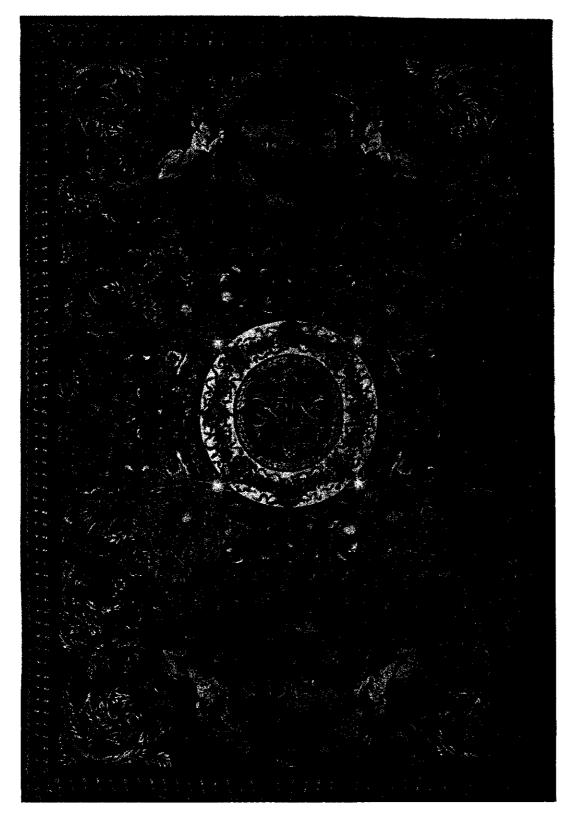
Exhibit A



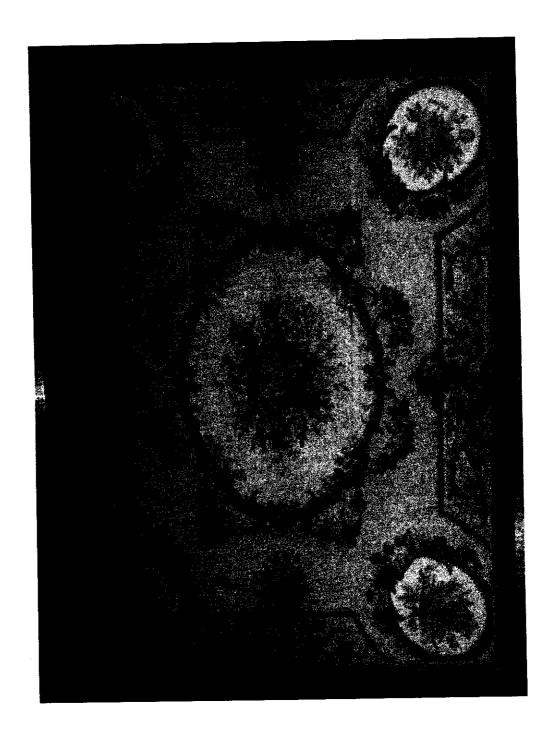
Renaissance S-151



Renaissance S-3



Renaissance S-179



Renaissance S-196

Exhibit B

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

EFT LUTTE OF PERSONATION

/3

Marybeth Peters

| 11070.00 Marybet | A Creation of America | The state of the s |
|--|--|--|
| | Calle I miter outle v | |
| | E: IF YOU HEED MORE SPACE, USE A SEPARATE COM | ITANUATION ENEEL. |
| DO NOT WRITE ABOVE THE LIN | | |
| TITLE OF THIS WORK Y SOVONNERIE S-15 | | 10065 |
| FREVIOUS OR ALTERNATIVE | | dical, serial, or collection, give information about the |
| PUBLICATION AS A CONTRIB collective work in which the contribut | UTION If this work was published as a contribution to a periotion appeared. Title of Collective Work 9 | Contract Contract |
| If published in a periodical or serial g | ive Volume V | |
| | | DATES OF BIRTH AND DEATH New Died |
| NAME OF AUTHORY | - TAPESTRY (RCI) | WAS THIS AUTHOR'S CONTRIBUTION TO |
| A REMAISSANCE CARPET | AUTHOR'S NATIONALITY OR DOMICILE | THE WOLL D'AND No. COMMON THE WOLL AND ADDRESS OF THE PERSON OF THE PERS |
| Was this contribution to the work a work made for him? | | Participations? 10 Miles No manufacture |
| 010 | OR Domicied in P Briefly describe nature of the material created by this author in v | hich copyright is claimed. |
| RATURE OF AUTHORSHIP Rugs in asso | Briefly describe function in the state of th | DATES OF BIRTH AND DEATH |
| NAME OF AUTHOR Y | | |
| () N/A | AUTHOR'S NATIONALITY OR DOMICILE | WAS THIS AUTHOR'S CONTRIBUTION TO |
| The work | | Asserymous! |
| What this cover work seads for him | 보이 1825년 : 1826년 1월 18 전 18 - 18 - 18 - 18 - 18 - 18 - 18 - | |
| N □ № | OR Domiciled in b | |
| NATURE OF AUTHORSHI | | DATES OF BIRTH AND DEATH YEAR BOON V |
| NAME OF AUTHORY | | |
| | | WAS THIS AUTHOR'S CONTRIBUTION TO |
| Was this contribution to the wo | AUTHOR'S NATIONALITY OR DOMICILE | THE WORK D No See decided |
| w dome of both Page (this continues made for his produced both) | 장 있다는 경찰에 <mark>생고 보고 있다. 이번 사람들은 하는 사람들은 하다는 사람들이 되었다. 그 사람들은 하는 사람들은 하다. 그 사람들은 하는 사람들은 하는 사람들이 되었다. 그 사람들은 하는 사람들이 되었다. 그 사람들은 하는 사람들이 되었다면 하는 것이다. 그런 사람들은 하는 사람들이 되었다면 하는 것이다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었</mark> | Paradonymous) Yes No No |
| 0 No | Domicised in D. [P. Briefly describe nature of the material created by this author | in which copyright is claimed. |
| NATURE OF AUTHORSH | IP Briefly describe faithful of the many | TON OF THIS PARTICULAR WORK |
| YEAR IN WHICH CREAT | ION OF THIS DATE AND NATION OF FRATT | UBLICATION OF THIS PARTICULAR WORK EMBER ON THIS PARTICULAR WORK |
| YEAR IN WHICH CREAT WORK WAS COMPLETE | | |
| 1095 476 | In all cooks | |
| COPYRIGHT CLAIMAN | T(S) Name and address must be given even if the claimant is the | LONE DEPOSIT RECEIVED |
| anne as the author given in a RENAISSANCE CAR | DET & TAPESTRY | THE TAX A SANCE OF THE SANCE OF |
| REMAISSANCE CAR | Lexington Avenue | TWO DEPOSITS PECENTED |
| | ነበ1 <i>6</i> | DESATIANCE NUMBER AND DATE |
| TRANSFER II the claiman in space 2, give a brief state | i(s) named here in space 4 are different from the author(s) named ment of how the claimant(s) obtained ownership of the copyright | |
| | | DO NOT WELL |

| | | | <u>CHECKTORY</u> | | er i de la companya de la companya La companya de la co | FOR |
|--|--|--|--------------------------------|--------------------------|---|---|
| | | | CORPESPO | | | COPYRIGHT OFFICE USE ONLY |
| | | 보통하는 수학자 이 시시 (1984년) 2017년 - 1일 전기 (1984년) 2017년 - 1일 전기 (1984년) | Corcolt A Funds un | D 1 | | ONLY |
| na. | HOT WRITE ABOVE THE LIM | e if you need hore by | ACE, USE A SEPARATE C | DATIBUATION | BHEET. | |
| PACUS REGIS Sel B 192 Hy Ship is the Seat Pac Date is the first as | HOT WRITE ABOVE THES LINE TRATION Has registration for the property in "Nex." why is another blished edition of a work previousl pleasion submitted by this author wendor of the work, as shown by in gives Previous Registration No. | this work. * regaristion being sought? (Ch !/ regaristed in impublished for sheepyright dalmant. space 6 on this application. | week appropriate bank) Y | | | |
| | DRK OR COMPILATION Contain identity any precideting with | | derivative week; complete an | y dia kapia dampili | Mon. | 6 |
| Medineval | Carpet Design | | | | | Superstructure Delive constructed and space |
| | This black Give a brief game | ral statement of the material th | at has been edded to this worl | and in while to | pyright is claimed. Y | |
| Adaptatio | n of dealer and an | | | | | |
| | OUNT Habe registration fee is be | be charged to a Deposit Acon | int established in the Copyris | | ne and exember of Action | |
| DEFOSIT ALL | | | | | | |
| | 교육 하셨습니다. 하는 그렇지 않아야 하다. | | 일 사람들이 어린 생생이 많아 있다. 얼마를 다음 | 电流 医神经性乳毒 化抗霉素抗抗症 | | |
| | | | this application should be ter | it. Numelaschean | Agricultura 3+ Y | |
| STEVEN B | ENCE Greenous and address to STREESOUTIZ, ESQ. | e which correspondence about attorney for cla | this application about he ter- | n Kureliseen a Carpat | Auchibisch V 6 Tapestty | |
| STEVEN B | . SIMMONITY, FOA. | e which correspondence about attorney for cla | this application should be ten | a Sarpet | Amcaybauca Y 6 Tapestty | Se man to Const your dispense greater |
| STEVEN B 633 Whee Hauppaug | Isr Koad NY 11788 | Coor 1 hopping Number 5 | | a Carpat | Ancombosity 6 Tapestty | So we to |
| STEVEN B 633 Whee Hauppaug | STREMOWILZ, ESQ: ler koad o, NT 11788 Ansa ON: Libe undersigned, bettby | Coor I history Name > (| | t Burelisten | Aucthorize V 6 Tapesity | - delene busus |
| STEVEN B 633 When Hamppaus CaptiliCATI Cod only one Quarter CaptiliCATI Cod only one | STREAGUELLZ, ESC. Ler Koad NT 11788 ON* Libe undersigned, batchy on dalarant | Coor I history Name > (| | Carpet | Authority 6 Tapesity | - delene busus |
| CARTIFICATI Cost only one C seeker | STREADY 1.2, ESC. Lor Road NT 11788 ON' L'the undersigned hereby hi daimant unive debites | Coor & humana Particle (| 516) 232-2117 | e Carpet | ABCRADEUS Y 6 Tapestty | - delene busus |
| CHTIPICATI CAST PARTY CHTIPICATI CAST PARTY | STREMON 1.2, LOVE LOVE LOVE LOVE LOVE LOVE LOVE LOVE | Coord humbers have a partie of the control of the c | 516) 232-2117 | e Carpat | ACCADED TO | - delene busus |
| STEVEN B 633 When Hamppaus CERTIFICATI Cock only and CRANCE Cock only and Cock only an | STREAGUE 1.2, ESC. Let Road NT 11788 ON' L'the undersigned hereby It daimant unive right(s) ont of Rana Lananasa Call streage of several power copyright co- tilled in this application and that I plication are current to the best of | Cook & heart of Parish and the Cooking Shall i and the Cooking Shall i and the Cooking Shall in the Cooking Shall | 315) 522-311/ | | | - delene busus |
| STEVEN B 633 When Hamppaus CaptiliCATI Cagt salves CaptiliCATI Cap | STREEGOW 1.2, ESQ. Let Road NT 11788 ON' Libe undersigned battly It daissant unive right(a) on a Rama is sance Call streegy and a series copyright call third in this application and that is plication are correst, to the book of a annur and date VII this is a pub K. STREEGOW 1.72 | Cook & heart of Parish and the Cooking Shall i and the Cooking Shall i and the Cooking Shall in the Cooking Shall | 315) 522-5116 | | | - delene busus |
| STEVEN B 633 When Hamppaus CaptiliCATI Cagt salves CaptiliCATI Cap | STREAGUE 1.2, ESC. Let Road NT 11788 ON' L'the undersigned hereby It daimant unive right(s) ont of Rana Lananasa Call streage of several power copyright co- tilled in this application and that I plication are current to the best of | Coor & huppers Parter > (Coor & huppers > | 315) 522-5116 | are of publication | 1 m V 2 m 2 m 2 m 2 m 2 m 2 m 2 m 2 m 2 m | |
| STEVEN B 633 Whee 633 Whee Bauppaug Captivity one Captivit | In Road In Road NT 11788 ON' L the undersigned, hereby In claimant unive rejucte and of Expals Sanca Car lifted in this application and that I plication are correct to the best of a new and date V if this is a pub E. SINCERONITY. Handy-higher-landors (XI V Planty V | Coor & humans remove by (coording that i and the coording that i and the coording that is considered to consider a considered to coordinate the coordinate that is considered to considered the considered to considered the considered that is considered to considered the cons | 5) 6) 232-3119 | are of publication | given to space 1 4/20/96 | |
| STEVEN B 633 When Bauppaug CERTIFICATI Coest paly one C subset C | In Road NT 11788 ON' Libe undersigned bereby In claimant unive reports and Expelies states Call states of the spolleston and that is pitation are correct to the book of a more and date Y if this is a pub R. SINCHONITZ Hand unique states are to the Law Office of St business framewoodness forces. | Coor & humans remove by (coor & humans remove by (coor & for the first the form of the for | 5) 6) 232-3119 | are of publication | given to space 3 A/20/96 | |
| STEVEN B 633 Whee 633 Whee Bauppaus CERTIFICATI Oscillation Oscill | In Road In Road NT 11788 ON' Libe undersigned hereby In claimant unive reports and of Expaissance Correct little in this application and that is planted in this application and the | Coor I human remove by (coor I humans remove by (coor I humans remove by the state of control of co | 5) 6) 232-3119 | are of publication | Girtin to space 1 4/20/96 | |

Case 1:09-cv-00296-RJD-RML Document 1 Filed 01/26/09 Page 21 of 27

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17. United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.



Revister of Copyrights, United States of America

| TITLE OF THE WORK Y. | S LINE OF YOU HEED HOME SPACE, USE A SEPARATE | NATURE OF THIS WORK Y |
|---|--|--|
| SAYOMERIE 8-3 | | |
| PRIVIOUS OF ALTERNA | 等等,1.560 B. 644 B. 在新的基本,可以通知,1.765 B. 1.765 B. | |
| PUBLICATION AS A CON | TREESTICK I this work was published as a practicality to a | pulledied, soiled, or collection, give information about |
| | | See Date V Contract |
| | | |
| NAME OF AUXHORY | | DATES OF BIECH AND DEATH to Beauty |
| | ET & TATESTEN (ECT) | WAS THE AUTHOR'S CONTRIBUTION |
| Who this game builden to the ar- famely made for the | TOWNS AND ENVIOUS PORTOR | THE WORK Disc in the Control of |
| | Disky describe subset of the material content by this ember | n which copyright in claimed. Y |
| + lbes in a | isortel sisse | DVIR OF BELLY WOOD ON US |
| WALL OF AUTHORY | | |
| | THE ALTERNATIONALITY OF DOMESTA | WAS THE AUTHORS CONTRIBUTED TO |
| | | C) Yes (2 No.) |
| NATURE OF AUTROES | AND THE RESIDENCE OF THE PROPERTY OF THE PROPE | |
| NAME OF AUGUST Y | | DATES OF SIRTH AND DEAD! |
| C 1/4 | AUTO S MERONALI VOR DOM CHA | WAS THIS AUTHOR'S CONTRIBUTED |
| Who this contribution to the ' 'work made let | Care V | THE WORK No No of feet |
| | Described in P | |
| | AND VARIOUS AND RESE | PLEASURE OF THIS PARTICULAR WORL |
| YEAR IN WHICH CREA | D No. 100 Per 1 Pe | 2 miles on 12 miles |
| 1995 AN | (TEE) Name and address asset he given even if the delicated in the | LECT TO THE SEMED |
| the author black to | THE & TAPESTEE | TONE DEPOSIT RECEIVED |
| Suite 431 200 | Lexington Avenue | TWO DEPOSITS NECEWED |
| | nt(s) named here in space 4 are different from the arthody) named resent of how the chalmant(s) obtained ownership of the copyright | SE SENTIMOS INVISER MODAIS |
| بفيقه أماميا والمسلم واستنبت والا | there of your the Constant's designed constantly in any | 19 (2) [일찍 (2) 전 (2) (2) (2) (2) (2) (2) (2) (2) (2) (2) |

| | | CHECKED BY | TOBLEYA |
|--|--|--|--|
| | O NOT WHETE ABOVE THIS LINE IF YOU KEED BOOK SPACE | CONNESPONDENCE DEPOSIT ACCOUNT PUNCE USED USE A SEMANATE CONTINUATIO | FOR COPPRIGER OFFICE USE ONLY |
| NEVSOUS REC This is the first This is the first This is see first This is a change | ISTRATION The registration for this work, or for an earlier version of your seasons to "its," only is another registration being sought? (Charle a published edition of a work puritously registrated in unpublished form, application submitted by this author on copyright chimens, and version of the work, as shown by space a an this application. 'Yes," give: Previous Registration Number Y here of Registration | | |
| Prosteting M | NORK OR COMPLATION Complete both spect for the for a desire desired telemitry my promiseling years or works that tills went to besed on 1 Carpet: Design | en kost; camples only & for Avenip or Incorporates. V | Sea Francisco |
| Woodd Add Adaptati | of to This White Christial, percent statement of the number that has been of design and additional artistic wo | ors added to the work and in which co inch | yraenti dahad. Y |
| DEPOSET ACCO | CUNT If the regimention fee in to be charged to a Deposit Account with Account No. | And the Capped Office of the | |
| STEVER I Suite Si | SENCE Greenser and address to which correspondence about this applied to the sent of the s | | |
| Check only ere! suther sther copyrigi | k deliment | 2175117 | |
| by one in this app Typed at printer | tified in this application and that the statements made plication are correct to the best of my knowledge. I name and date V If this is a published work, this date must be the same H. SIMENOWITZ | 15 or later than the date of publication | il/29/95 |
| | Handwritten dignature (20 V | | |
| MAR CERTIFICATE TO CATE TO Cartificate will be unable in windown | Law Offices of Steven H. Simenowits **The Control of Ste | | Ryne year Completed all necessary general Signed your application in space If Embassed charak of memory order to 510 payeste to Propher of Copyrights? Signed your deposit metarist such the application and loss? ISAN, TOR. Register of Copyrights, Liberty of Copyrights, D.C. 20058- |

^{* 17} U.S.C. (SOCiet Any person who knowingly makes a lates representation of a manufact in the application for application fo

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with little 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.



FORM VA

| | | OFFICIAL SEAL | REGISTER OF COPY | OF COPYRIGHTS I States of America | | |
|------|---------------------------------------|---|---|--|--|--|
| | | DO NOT WRITE ABOVE THIS I | INE. IF YOU NEED MORE SPACE, USE A SEPAR | 大学的ななななない はんしゅう アンドル・アン・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・ | | |
| | 4 | TITLE OF THIS WORK V | | NATURE OF THIS WORKY Sections | | |
| | SAV | ONNERIE S-179 | | XUCS | | |
| | | PREVIOUS OR ALTERNATIVE | | | | |
| | | PUBLICATION AS A CONTEL collective work in which the contribu | SUTION If this work was published as a contribution of the appeared. Title of Collective Work V | o a periodical, serial, we collection, give information about the | | |
| | | If published in a periodical or serial, | Pre-Volum ▼ Nember V | Insur Debry Configury | | |
| | 7 | NAME OF AUTHOR Y | | DATES OF BIRTH AND DEATH | | |
| q . | 2 | a renaissance carpet | & Tapestry (ect) | Nethor | | |
| | | What this contribution to the work a "work made for him?" | AUTHOR'S NATIONALITY OR DOMICILE None of Courts On Colons of the | WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Accompanie: | | |
| | NOTE | NATURE OF AUTHORSHIP Rugs in assor | • Domicked in ▶_ Briefly describe mature of the material created by this author | Proviouspaces! the No | | |
| | | NAME OF AUTHOR ▼ | | DATES OF BIRTH AND DEATH WAS BOOK W. | | |
| | | Was this contribution to the work a work made for him? | AUTHOR'S NATIONALITY OR DOMICILE | WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK IN THE WORK IN THE WORK IN THE WORK IN THE PROPERTY | | |
| 590 | 200 | NATURE OF AUTHORSHIP | OR Domiciled in P | Previdenymous? Nes | | |
| 42 | 1 | | | | | |
| 5480 | 180 | NAME OF AUTHOR V | | DATES OF BIRTH AND DEATH Year Born V Sher Died V | | |
| | e e e e e e e e e e e e e e e e e e e | Was this contribution to the work a "work made for hire"? | AUTHOR'S NATIONALITY OR DOMICILE | WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK | | |
| | | <u>D</u> No | Citizen of P. Domidled in P. | Preudonymous? Yes No Justices | | |
| | | AALUKE UP AUTHORSHIP | riefly describe nature of the meterial created by this author | r in which copyright is delined. Y | | |
| | 3 | YEAR IN WHICH CREATION OF WORK WAS COMPLETED THE | OF THIS DATE AND NATION OF FIRST I | UBLICATION OF THIS PARTICULAR WORK Cember ON P 23 WE 1995 | | |
| | | COPYRIGHT CLAIMANTIS) N | the and address must be given over if the delegate is the | APPLICATION RECEIVED | | |
| | 4 | REMAISSANCE CARPET | 얼마리 보일이 살아왔다. 여러 이렇게 그 사건은 얼마나 사이를 가고 하다. | | | |
| | S Soo instructions | Suite 431 200 Lexis | igton Avenue | E JONE DEPOSIT RECEIVED | | |
| | before completing Post space | | | TWO DEPOSITS RECEIVED | | |
| | | to space 2, give a brief statement of h | d here in space 4 are different from the outhor(s) named ow the claimant(s) obtained ownership of the copyright. V | REMITANCE NUMBER AND DATE | | |

| Case 1:09-cv-00296-RJD-RML | Document 1 Filed 01/26/00 Page 24 of 27 |
|--|--|
| | EXAMPLED BY JUST ROBIN 19. |
| | CHECKED BY MU |
| | COPPESSONOEICE COPYRIGH COPPESSONOEICE COPPESSON COPPESS |
| DO NOT WRITE ABOVE THIS LINE IF YOU NEED AG | DEPOSIT ACCOUNT USE ONLY PENOS USED ONLY RE SPACE, USE A SEPARATE CONTINUATION SHEET |
| US REGISTRATION Has registration for this work, or for an earling No. 11 your answer to "Yes," why is another registration being sought the first published edition of a work previously registered in unpublish | ler version of this work, abusdy been made in the Copyright (Olice) delt (Cloric appropriate bon) ▼ |
| the first application submitted by this author as copyright chiment. a changed version of the work, as shown by space 6 on this applicatio | |
| maria di Nasa pina Romana Lagrandia Nasa da Na | |
| TIVE WORK OR COMPILATION Complete both space do & the letting Material. Identify any precisiting work or works that this work |) for a derivative work; complete only 66 for a compilation, a is based on or incorparate. Y |
| Atval Carpat Baston | |
| lal Added to This Work. Give a brief, general statement of the materia | before computes the state of th |
| tation of design and additional article | 어머니와 생물을 생겨왔다면 생각하다. 이번에는 내면 사람들은 살 때문에 가는 사람이 되었다. 그런 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은 사람들은 |
| TACCOUNT If the registration for it to be charged to a Deposit Ap | stours established in the Copyright Office, give name and sunday of Account. Hits Account Names 7 |
| kin . 11 Sin san bi Fra | M36369 |
| PONDENCE Give make and address to which correspondence abo | ena teranta kanatambangsa. Atasi indi sama salutrahan asma daga akta hasa atawa 1939 atau da 1955 da 1956 da 1 |
| M B. SIMENOWITZ, ESQ. attorney for cl Wheeler Road | Leisant Renaissance Carpet & Tapearty |
| pauge, NY 11788 | |
| Area Cook & Begnore Number & CATION* I, the undersigned, hereby certify that I am the | (516) 232⊂3117 director |
| 7 √ | |
| epride delman L'achain rights | |
| and agent of <u>Rena Legapore</u> <u>Carper</u> <u>6. Tapestry</u> Herre of author of other copyright content. or comit of exclusive rights) | |
| tidentified in this application and that the statements made its application are correct to the best of my knowledge. | |
| related some and date Y If this is a published work, this date must be EN R. SINGUICELTZ | the same as or later than the date of publication given in space 3. 4/20/96 |
| → Handwrittep algoratem (X) ♥ | |
| | |
| Law Office of Steven H. Simenovit | Complete Amounts |
| 633 Wheeler Road | Committee Control Control Committee Control Committee Control Committee Control Committee Control Committee Control Committee Control |
| Hauppause NY 11788 | |
| SOU(d): Any person who knowingly makes it time hypersymbon of it repaying fact t | |

Gase 1:09-cv-00296-RJD-RML Document 1 Filed 01/26/09 Page 25 of 27

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17. United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

C Form VA

Sec. VA 1-813-161

EFFECTIVE AND FREESTATION

EFFECTIVE AND FREESTATION

Marybeth Geters
Register of Copyrights, United States of America

| | DO NOT WHITE ABOYE THE LINE IF YOU | NEED MORE SPACE VI | e a reparate co | KTRAVATATAL BUR | st | |
|--|--|--|--|--|-------------------------|--|
| | THE OTHER WORK W SAVONNERIE DESIGN S 196 | | | THIS WORK V | | |
| | Province & Champion Filter V | | | | | |
| | Publication on a Contribution of an end we published a grant Title of Oldacine Work Y | bahya ya ii caamballiya ta a part | abcal versit or collection | | ta (albandrost in the s | |
| 2000 a 100 a | Franklades spinotistes and pro. Vela V | | ** ** | 7 | | |
| 9 | NAME OF AUTHOR V Remaintance Corpet & Tapestries Inc. | | | ATES OF BERTH | NO DEATH Yes Dud V | |
| NOTE | No. 1 April 1982 Process of the Control of the Cont | wy Fig. 12 The Control of the Contro | | D | | |
| I WENT PORT PARTIES IN CONTROL IN CONTR | Nature of Authorator Cack apropriate basins Se [] 3 Demonstrand Scalpture [] 2 Depositional servork [] Reproduction of work of art | e hetructione () May () Photograph () Javelry design | ☐ Technical drawing ☐ Test ☐ Architectural wor | | | |
| made for h re drack Yes in the seaso provided price | | | | C Street and Death our Boys Y | Year Dead W | |
| (or other person for whom the work was property as Author of that part and | C) Yes Com | indicality or Dealette 1977 m of spied a | . | Ya Tib Aabe (C especial City market City | | |
| incree in a delication of both blook delicates blook | Nature of Authoritop Charles propose basin) & [1] \$ Dimensional conjector [2] \$ Dimensional stretch [3] Reproduction of work of act | es tratinations (Julie O Philograph O Jewelly daugs | i Tocimeal deswing Test Aschieccural work | | | |
| 3 a | 2000 - To East | b Editor | | | , 2001 | |
| 4 | COPYRIGHT CLASSANT(S) Name and address state growt a space 2 V Repairsance Curpet & Tapertries Inc 200 Lexington Avenue Suite 1006 New York NV 10016 | | | MO DEPOS | PROGRAMED TO RECEIVED | |
| | Trimster It die chimmet() named here is speci i is (in brief diesentel of here the chimmet() absentel consection | of definition from the authors of the company of th | | FUNDS RECE | NEO X | |

| DO NOT WHITE ABOVE THE LISE IS YOU HELD BOTH SEACH ONE A SEPARATE CONTRACTOR SHEET BOULD SEQUENCE THE SEQUENCE IS NOT THE SEACH OF THE SEACH ONE A SEPARATE CONTRACTOR SHEET BOULD SEQUENCE THE SEQUENCE IS NOT THE SEACH OF THE SEACH ONE A SEPARATE CONTRACTOR SHEET BOULD SEQUENCE IS NOT THE SEQUENCE IS NOT THE SEACH OF THE SEACH ONE A SEPARATE CONTRACTOR SHEET BOULD SEQUENCE IS NOT THE SEACH OF THE SEACH | | | | EXAMPLED BY | Sp | |
|--|---------------------|--|---------------------------------|--|----------------------------------|---------------------------|
| CONTINUED AND THE CONTINUED AND ADDRESS OF THE ADDR | | | | | CADENCE | COP (AUX OFFICE USE |
| DOS DESCRIPTA TOO to a processor of the color of the colo | | O HOT WHITE ABOVE THIS LINE WY | at jesto kora s rac | Z USE A SEPÁRATE | poenskii kuosi sijasti | |
| The Post of the Control of the Contr | | GENATOR ELECTRICAL | | ة دخت سارختم شر | s Command Company | |
| VALUE OF CONTRACTOR Complete to contract to sell to the Company of the programme of the pro | را دار. مادوران | re apple was whereal by the teller is copyright and spread of the west or deposity spots find t | | ≜ —.▼ | | |
| DAT ACCOUNT I the experiment has in the charged a librage Assembly and the Copyright Office. Libration of Assembly and R. Santanoweriz (Eng.) DA 2009 DESCRIPTION OF The continuous and observe the charged and the paperson should be not Recolably and Rec | | WORK OF COMPLATION STATE | | | | |
| DAT ACCOUNT I the experiment has in the charged a librage Assembly and the Copyright Office. Libration of Assembly and R. Santanoweriz (Eng.) DA 2009 DESCRIPTION OF The continuous and observe the charged and the paperson should be not Recolably and Rec | | | | | | |
| The production of the system o | | d to Tab West Core shirtly amed screens of | | | | |
| Streem II Summoraries England to the property of the property | BÎT ACI | COUNT No. marine has a second of the | Chapter Assessing and Assessing | In the Copyright Dellar, Life | | |
| Win H Summowite Beq (I) Maple Street (I) Contemporate MA 01028 (I) At 15 325 1846 (I) Francis (A13) 525 1847 (A13) 525 | n H S | managed Bo | | DA 80209 | | 4 |
| Maple Street if originations MA 01028 Continue Co | | | | | | • |
| SEFECATION? I the entering of landy only the land by Code only only the code only only the land by Code only only the code only only the land by The code only only the code only only the land by the code of the code of the land of | Marie | : Street mandow: MA 01028 | | | . a13. 525 16.7 | |
| Configuration of Configuration Companies Inc. Configuration of Configuration Companies Inc. Configuration of Configuration Companies Inc. Configuration of Configuration of Configuration Inc. Configuration of Configuration of Configuration Inc. Configuration of Conf | A Comment | | | | | |
| The following of the complete | apica 1 | HOM: 1 the colour of the Colour of the | | | | |
| Patriary 3 2006 Transportix Discovery 3 2006 The second of the patriary 3 2006 The | | | | Contract of conduction registration of the conduction of the condu | وي كالمستاء الأوليات بيطاح البطا | |
| Soul II Security Sells Security Sells Security S | wak da I ar pani | and some and done Y If the application protest | The second of the second | | | 2006 |
| 29 Maph Street | rea II Ma | Simenowiti | | | Doo | |
| 29 Mark Street | X | | | | | |
| | | Strain Barrers Ba | | | | |
| Bast Longsteedow MA: 01628 | iope is | | | | | |

| ndex No: UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK | |
|---|---|
| RENAISSANCE CARPET & TAPESTRI | IES, INC., Plaintiffs, |
| | -against- |
| CLASSIC FURNITURE AND GERMAN BOLOTNIKOVS individually, | NS Defendants. |
| SUMMO | ONS AND COMPLAINT |
| MANCINE 111 Jo | even Mancinelli elli & Associates, P.C. ohn Street, suite 800 v York, N.Y. 10038 212-962-6525 |
| Pursuant to 22 NYCRR 130-1.1, the undersigned York State, certifies that, upon information and lannexed document are not frivolous. | d, an attorney admitt ed to practice in the courts in the courts of New belief and reasonable inquiry, the contentions contained in the |
| Dated:Signature | |
| Print Signer's Name Service of a copy of the within Dated: | |

Attorney(s) for